

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MORLYNE YOUNG,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:12-CV-01180-AGF
	)	
LVNV FUNDING LLC,	)	
	)	
Defendant.	)	

**DEFENDANT’S PROPOSED VOIR DIRE QUESTIONS**

COMES NOW Defendant LVNV Funding LLC (“Defendant”) and, pursuant to the Order entered on December 31, 2013 (Doc. 99), proposes that the Court pose the following questions to the prospective jurors in this case:

1. Do you know the Plaintiff, Morlyne Young, or know someone who knows or is associated with him? If so, please explain.
2. Have you or anyone you know ever defaulted on a loan or been the target of debt collection activities? If so, when, what were the circumstances and did you experience any problems.
3. Has anyone ever filed a lawsuit against you, your spouse or a relative to try to force payment of money owed? If so, when, what were the circumstances, what was the result and did you experience any problems?
4. Have you or anyone you know ever had to contest debt collection practices? If so, when, what were the circumstances, what was the result and did you experience any problems?

5. Have you or anyone you know ever had a dispute or disagreement of any kind with a debt collection company or any unpleasant experience with a debt collection company? If so, please state the circumstances.

6. Have you or anyone you know ever had a dispute or disagreement of any kind with a creditor or any unpleasant experience with a creditor? If so, please state the circumstances.

7. Have you or anyone you know ever had a dispute or disagreement of any kind with a credit reporting agency or any unpleasant experience with a credit reporting agency? If so, please state the circumstances.

8. Have you or anyone you know ever sought employment from, or been employed by, a company focused on consumer rights or consumer protection? If so, please explain.

9. Have you or anyone you know ever sought employment from, or been employed by, a company engaged in collecting debts? If so, please explain.

10. Have you or anyone you know ever worked for a law firm or otherwise worked in the legal field? If so, please explain.

11. Have you or anyone you know ever sought employment from, or been employed by, LVNV Funding LLC? If so, please explain.

12. Has anyone ever sent you a bill that you did not agree that you owed? Did you ever want to sue anyone over it? Describe the circumstances.

13. Have you ever looked at your credit report? If so, please state how often and when the last time was that you looked at your credit report.

14. Have you ever disputed information appearing on your credit report? If so, please describe the nature of that dispute and how it was resolved.

15. Have you ever sued anyone? Who? Describe generally what the lawsuit was about.

16. Have you, your spouse or a relative ever filed for bankruptcy? If so, please describe.

17. Do you have any beliefs in general about debt collectors or credit reporting agencies that might affect your ability to be impartial in this case?

18. Do you have any beliefs in general about credit card companies? Would your beliefs affect your ability to be impartial in this case?

19. Do you have any thoughts or feelings that simply because someone filed a lawsuit, the person or company sued must have done something wrong?

20. Do you have any thoughts or feelings that simply because someone filed a lawsuit, the person suing is entitled to monetary compensation?

21. Do you understand that sympathy is to play no role in your deliberations?

22. Is there any reason you cannot be fair and impartial in this case?

Dated this 8<sup>th</sup> day of January, 2014.

Respectfully submitted,

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically with the United States District Court for the Eastern District of Missouri, Eastern Division, this 8<sup>th</sup> day of January, 2014, with notice of case activity generated and sent to Plaintiff, via United States first class mail, postage prepaid, and via e-mail transmission, addressed as follows:

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